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15 Attorneys for Plaintiffs
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 17 Fleischer, and Jacqueline Fleischer

18 **UNITED STATES DISTRICT COURT**
 19 **CENTRAL DISTRICT OF CALIFORNIA**

20 TC RICH, LLC, a California Limited
 21 Liability Company, RIFLE FREIGHT,
 22 INC., a California corporation,
 23 FLEISCHER CUSTOMS BROKERS, a
 24 sole proprietorship, RICHARD G.
 25 FLEISCHER, an individual, and
 26 JACQUELINE FLEISCHER, an
 27 individual,

28 Plaintiffs,

v.

29 PACIFICA CHEMICAL,
 30 INCORPORATED, a California
 31 corporation, AQUA SCIENCE
 32 ENGINEERS, INC., a California
 33 Corporation, A/E WEST
 34 CONSULTANTS, INC., a Nevada
 35 Corporation, and DOES 1 through 10,
 36 inclusive,

Defendants.

Case No. CV 15-4878 DMG (AGRx)

Assigned to the Hon. Dolly M. Gee

**EIGHTH FURTHER JOINT
 QUARTERLY STATUS REPORT
 AS ORDERED BY THE COURT**

Action filed: June 26, 2015
 Discovery: Stayed
 Trial date: None set

1 The parties jointly submit this Eighth Further Joint Status Report.

2 The six prior joint reports were filed on:

- 3 1. January 19, 2018 (Dkt. 91);
- 4 2. October 19, 2018 [Dkt. 96];
- 5 3. November 14, 2018 [Dkt. 98];
- 6 4. February 7, 2019 [Dkt. 100];
- 7 5. February 28, 2019 [Dkt. 103]; and
- 8 6. May 14, 2019 [Dkt. 117].
- 9 7. August 14, 2019 [Dkt. 118].

10 This Eighth Further Joint Quarterly Status Report addresses the status of the
11 site investigation of the environmental contamination and likely returning to
12 mediation to conduct a second session.

13 1. Site Investigation

14 Pacifica is in the field implementing an enhanced reductive dichlorination
15 (“ERD”) Pilot Test. The purpose of the ERD Pilot Test is to obtain information that
16 will assist in an appropriate full-scale groundwater remediation design, including
17 evaluation of the effectiveness of ERD, which is to include bioaugmentation. From
18 July 8 to 26, 2019 and from August 12 to 23, 2019, Pacifica Chemical’s
19 environmental contractor (“Murex”) performed pilot study injections and is in the
20 process of collecting performance data from wells within the study area. Murex has
21 conducted several post-injection monitoring events and will conduct two additional
22 events this month and in February 2020 before reporting on the pilot test to DTSC in
23 April 2020.

24 2. Mediation

25 The parties continue to anticipate returning to mediation with Mr. Gallagher.
26 Defendant contends that the most opportune time to return is after the pilot test
27 report is submitted to DTSC in April 2020 to assist in better estimating future
28 remedial costs. Plaintiffs agree that a reliable estimate of future costs is important

1 but are concerned that the parties are otherwise in disagreement regarding realistic
 2 assessments of relative liability. Nonetheless, the parties continue to believe that
 3 areas of dispute and agreement were identified with Mr. Gallagher's assistance on
 4 February 22, 2019 and conclude that a further session after more is known about the
 5 extent of contamination and remedial options available to address it will better
 6 position the parties in their efforts to achieve a settlement.

7
 8 Dated: November 14, 2019

RAINES FELDMAN LLP

/s/ John S. Cha

 John S. Cha
 Counsel for Plaintiffs

12
 13 Dated: November 14, 2019

**PILLSBURY WINTHROP SHAW
 PITTMAN LLP**

/s/Mark Elliot

 Mark Elliott
 Counsel for Plaintiffs

17
 18 Dated: November 14, 2019

PALADIN LAW GROUP[®] LLP

/s/Bret A. Stone

 Bret A. Stone
 Counsel for Defendants Pacifica Chemical,
 Incorporated

23
 24 Dated: November 14, 2019

FOLEY & LARDNER LLP

/s/ Sarah A. Slack

 Sarah A. Slack
 Counsel for Plaintiff-Intervenor